

CFTC Ex. 535

**DECLARATION UNDER PENALTY OF PERJURY OF
JOSEPH J. PATRICK PURSUANT TO 28 U.S.C § 1746**

I, Joseph J. Patrick, hereby declare as follows:

1. I am employed with the United States Commodity Futures Trading Commission (“CFTC”) as a Senior Investigator in the Division of Enforcement (“Division”).

2. My primary responsibilities include conducting investigations to determine whether there have been violations of the Commodity Exchange Act and Commission Regulations. In connection with these responsibilities, I analyze bank records, documents related to trading, account opening documents, and customer records for commodity futures, commodity options, swaps, and off-exchange foreign currency (“forex”) accounts; trace the flow of funds through bank, commodity futures, commodity options, and forex trading accounts; review corporate formation documents filed with various state and federal agencies; and review applicable registration information for entities and individuals in the U.S. futures industry, among other activities.

3. From June 1996 to July 2010, I held various regulatory compliance positions at National Futures Association (“NFA”), the independent self-regulatory organization for the U.S. futures industry. In these positions, I was responsible for conducting examinations and investigations of commodities, futures, options and forex trading firms, including performing analyses of trading activity, cash flows, and sales practices and initiating formal disciplinary actions when violations of NFA rules were detected.

4. I received a Bachelor of Science degree in Accounting in 1996 from University of Illinois at Chicago and hold a certification as a Certified Fraud Examiner (CFE).

5. In March 2019, I was assigned to an investigation concerning Long Leaf Trading Group, LLC (“Long Leaf”) and its owners James A. Donelson (“Donelson”) and Timothy Evans

(“Evans”). Among other things, I was assigned to review and summarize trading records of Long Leaf’s retail customers, including without limitation daily trade confirmations, monthly activity statements, and emails between Long Leaf and its customers, in order to determine the total trading losses by customers that agreed to participate in Long Leaf’s “trading program” between June 2015 and December 2019 (“Relevant Period”).

6. To that end, I reviewed trading records produced by Gain Capital Group, LLC (“Gain”), a CFTC registered futures commission merchant (“FCM”) located in Bedminster, New Jersey, and Cunningham Commodities, LLC (“Cunningham”), a CFTC registered FCM located in Chicago, IL. I also reviewed documents and testimony provided by Long Leaf to determine which accounts belonged to customers that participated in the trading program.

7. Truthful and accurate summaries of the foregoing, which I personally prepared, are set forth herein as Exhibit A and include the monthly and cumulative profits and losses (“PNL”) incurred at Gain and Cunningham by Long Leaf customers participating in the trading program. I do not offer any opinion with respect to these records, and I have not made any independent determinations as to whether these the records support inferences which support the CFTC’s claims. The extent of my analysis has been to format, filter, and summarize customer trade data provided by Long Leaf’s FCMs.

A. Records Reviewed

8. In April 2019, the National Futures Association (“NFA”), a futures and options industry self-regulatory organization, produced records to the CFTC reflecting that, since September 2019, Long Leaf introduced its customer futures accounts to Cunningham. NFA records produced to the CFTC also reflect that prior to September 2019, Long Leaf introduced accounts to Gain.

9. On May 13, 2019, I issued a request under Section 4g of the Commodity Exchange Act to Gain for, among other items, records regarding the futures and options accounts and trading activity of Long Leaf's customers.

10. As part of Gain's response to the 4g request, Gain produced, in July 2019, a dataset in Excel format containing the customer trading data reflected in the daily activity statements that Gain issued to Long Leaf's customers. The dataset was called Long Leaf Balances.xlsx ("Gain Dataset") and contained more than 325,000 rows of data representing all daily activity statements compiled for Long Leaf customers from January 2014 to December 2018.

11. On May 13, 2019, I issued a request under Section 4g of the Commodity Exchange Act to Cunningham for, among other items, records regarding the futures and options accounts and trading activity of Long Leaf's customers. As part of Cunningham's response to the 4g request, Cunningham produced, in the summer and fall of 2019, a series of Excel files containing customer activity records for all Long Leaf customers for each month from September 2018 through December 2019. The excel files contained over 1,300 rows of data representing all monthly activity statements compiled by Cunningham for Long Leaf customers. I combined the data Cunningham produced in the Excel files into a single dataset. ("Cunningham Dataset").

12. On November 30, 2020, in response to a document request issued by the CFTC, Long Leaf produced an Excel spreadsheet to the CFTC with the filename "Self Directed Traders as of 7262018_4682365.xlsx" containing the names and account numbers for 40 Long Leaf customer accounts. The document is attached hereto as Exhibit B.

13. During his June 23, 2021 deposition, on pages 130:7 – 131:24, defendant Donelson confirmed that the customer accounts identified in Exhibit B were the only Long Leaf accounts that did not participate in the trading program during the Relevant Period.

14. Using the list of accounts in Exhibit B for reference, I identified and marked each customer account in the Gain and Cunningham Datasets as a) self-directed, or b) a participant in the trading program. I then filtered the results to review only the accounts of customers who participated in the trading program.

B. Net Losses for Trading Program Participants

Profit and Loss at Gain for customers participating in trading program

15. To determine the PNL, net of all commissions and fees, realized by Long Leaf customers trading at Gain and participating in the trading program during the Relevant Period, I combined the values contained within the Gain dataset in the “OptionPremium”, “Commissions”, “ClearingFees”, “GiveInFees”, “NFAFees”, “TransactionFees”, and “AllOtherFees” fields into a summary field called Net Realized PNL.

16. To confirm the accuracy of the values reflected in the Gain Dataset, on a sample basis, I traced and agreed the values in the columns of the Gain Dataset to the individual monthly customer activity statements produced by Gain during the investigation. I did the same thing with respect to the Net Realized PNL reflected in the Gain Dataset.

17. Based on my review of the Gain Dataset, Long Leaf customer accounts participating in the trading program suffered trading losses at Gain totaling \$4,564,485 during the Relevant Period. *See Ex. A.* 280 of the 285 customer accounts in the Gain Dataset that participated in the Long Leaf trading program during the Relevant Period lost money.

18. Long Leaf's pleadings reflect that Defendant Evans was CEO of Long Leaf from at least June 2015 through November 2017. (Doc. 23, Long Leaf's Ans. ¶¶ 17-18.) \$3,390,407 of the Long Leaf customer losses in the Gain Dataset were incurred during that period. *See Ex. A.* \$1,174,078 of those losses were incurred between December 2017 and September 2018, i.e., when Donelson was CEO but before the switch to Cunningham.

Profit and Loss at Cunningham for customers participating in trading program

19. To determine the PNL, net of all commissions and fees, at Cunningham incurred by Long Leaf customers participating in the trading program during the Relevant Period, I combined the values contained within the Cunningham dataset in the "Realized PNL", "Commission", "Clearing Fee", "NFA Fee", and "Transaction Fee" fields into a summary field called Net Realized PNL.

20. To confirm the accuracy of the values reflected in the Cunningham Dataset, on a sample basis, I traced and agreed the values in the columns of the Cunningham Dataset to the individual monthly customer activity statements produced by Cunningham during the investigation. I did the same thing with respect to the Net Realized PNL reflected in the Cunningham Dataset.

21. Based on my review of the Cunningham dataset, Long Leaf customers participating in the trading program suffered losses at Cunningham totaling \$1,202,660 during the Relevant Period. *See Ex. A.* 108 of the 118 customer accounts in the Cunningham Dataset that participated in the trading program during the Relevant Period lost money.

Total Losses

22. Overall, Long Leaf customers participating in the trading program lost a combined total of \$5,767,145 at Gain and Cunningham between June 2015 and December 2019. *See Ex. A.* These losses include losses from trading, as well as commissions and fees.

23. Long Leaf's pleadings reflect that defendant Donelson was CEO of Long Leaf from December 2017 to the present. (Doc. 23, Long Leaf's Ans. ¶ 18.) \$2,376,738 of the losses occurred when Donelson was CEO. *See Ex. C.*

C. Commissions Charged by Long Leaf

Commissions paid on Gain transactions

24. During the investigation, Gain produced a document to the CFTC reflecting the commission payments made by Gain to Long Leaf between December 2012 and April 2019. *See Ex. D.* These records reflect that Gain paid a total of \$3,842,619 in commissions to Long Leaf between July 2015 and September 2018.

25. In his June 23, 2021 deposition, on pages 137:20 – 138:1, defendant Donelson stated that 90% of the commission payments made to Long Leaf by Gain were attributable to customers participating in the trading program.

26. Based on defendant Donelson's deposition testimony, I calculated that Long Leaf was paid \$3,458,357 in commissions by Gain for trading by customers participating in the trading program (total Gain commissions paid of \$3,842,619 x 90%).

Commissions paid to Long Leaf by Cunningham

27. Defendant Donelson testified in his June 23, 2021 deposition, on pages 131:19 – 131:24, that all Long Leaf customer accounts opened after July 26, 2018 participated in the trading program. Since Cunningham carried Long Leaf customer accounts starting in September

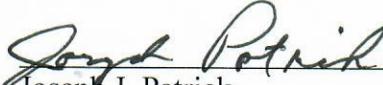
2018 and continuing through December 2019, all Long Leaf customer accounts opened at Cunningham were participants in the trading program.

28. During the investigation, Cunningham produced records reflecting that Long Leaf was paid \$552,637 for customer trading between September 2018 and December 2019. *See Ex. E.*

Total Commissions

29. Overall, Long Leaf received a combined total of \$4,010,994 in commission payments from Gain and Cunningham attributable to Long Leaf accounts participating in the trading program during the Relevant Period. \$1,235,413 of the total commissions were paid to Long Leaf when Donelson was CEO.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.



Joseph J. Patrick

Executed on this 4th day of November, 2021, in Chicago, Illinois.

Ex. A

Long Leaf Trading
Monthly and Cumulative Profits and Losses (PNL)
of Participants in the Trading Program
June 2015 - December 2019

Year-Month	Monthly PNL at Gain	Monthly PNL at Cunningham	Combined Cumulative Net Realized Profit and Loss
2015-06	(\$82,559.57)		(\$82,559.57)
2015-07	(\$161,229.36)		(\$243,788.93)
2015-08	\$213,899.10		(\$29,889.83)
2015-09	\$178,333.01		\$148,443.18
2015-10	(\$190,308.58)		(\$41,865.40)
2015-11	(\$266,748.45)		(\$308,613.85)
2015-12	(\$250,038.01)		(\$558,651.86)
2016-01	(\$80,719.77)		(\$639,371.63)
2016-02	(\$308,626.59)		(\$947,998.22)
2016-03	\$117,937.05		(\$830,061.17)
2016-04	(\$88,049.76)		(\$918,110.93)
2016-05	(\$84,687.18)		(\$1,002,798.11)
2016-06	\$3,686.30		(\$999,111.81)
2016-07	(\$157,148.64)		(\$1,156,260.45)
2016-08	\$28,231.34		(\$1,128,029.11)
2016-09	\$39,439.47		(\$1,088,589.64)
2016-10	(\$113,608.20)		(\$1,202,197.84)
2016-11	\$51,520.71		(\$1,150,677.13)
2016-12	\$209,409.47		(\$941,267.66)
2017-01	(\$353,768.99)		(\$1,295,036.65)
2017-02	(\$387,681.16)		(\$1,682,717.81)
2017-03	\$159,582.09		(\$1,523,135.72)
2017-04	\$113,329.45		(\$1,409,806.27)
2017-05	(\$549,086.24)		(\$1,958,892.51)
2017-06	\$233,971.83		(\$1,724,920.68)
2017-07	(\$193,385.87)		(\$1,918,306.55)
2017-08	(\$1,217,117.86)		(\$3,135,424.41)
2017-09	\$305,867.87		(\$2,829,556.54)
2017-10	(\$97,655.27)		(\$2,927,211.81)
2017-11	(\$463,194.77)		(\$3,390,406.58)
2017-12	\$50,662.79		(\$3,339,743.79)
2018-01	(\$710,299.72)		(\$4,050,043.51)
2018-02	(\$210,665.91)		(\$4,260,709.42)
2018-03	\$69,714.07		(\$4,190,995.35)
2018-04	(\$343,316.49)		(\$4,534,311.84)
2018-05	(\$16,435.94)		(\$4,550,747.78)
2018-06	(\$44,398.68)		(\$4,595,146.46)

Year-Month	Monthly PNL at Gain	Monthly PNL at Cunningham	Combined Cumulative Net Realized Profit and Loss
2018-07	(\$46,000.72)		(\$4,641,147.18)
2018-08	\$56,799.03		(\$4,584,348.15)
2018-09	\$19,863.26	\$118,489.53	(\$4,445,995.36)
2018-10		\$19,876.92	(\$4,426,118.44)
2018-11		(\$305,473.43)	(\$4,731,591.87)
2018-12		(\$119,988.99)	(\$4,851,580.86)
2019-01		(\$40,968.02)	(\$4,892,548.88)
2019-02		(\$72,530.78)	(\$4,965,079.66)
2019-03		(\$56,411.48)	(\$5,021,491.14)
2019-04		(\$45,604.46)	(\$5,067,095.60)
2019-05		(\$66,668.59)	(\$5,133,764.19)
2019-06		(\$281,247.92)	(\$5,415,012.11)
2019-07		\$301,638.99	(\$5,113,373.12)
2019-08		(\$56,352.49)	(\$5,169,725.61)
2019-09		\$146,099.22	(\$5,023,626.39)
2019-10		(\$153,558.29)	(\$5,177,184.68)
2019-11		(\$485,808.16)	(\$5,662,992.84)
2019-12		(\$104,151.67)	(\$5,767,144.51)
Total PNL	(\$4,564,484.89)	(\$1,202,659.62)	(\$5,767,144.51)

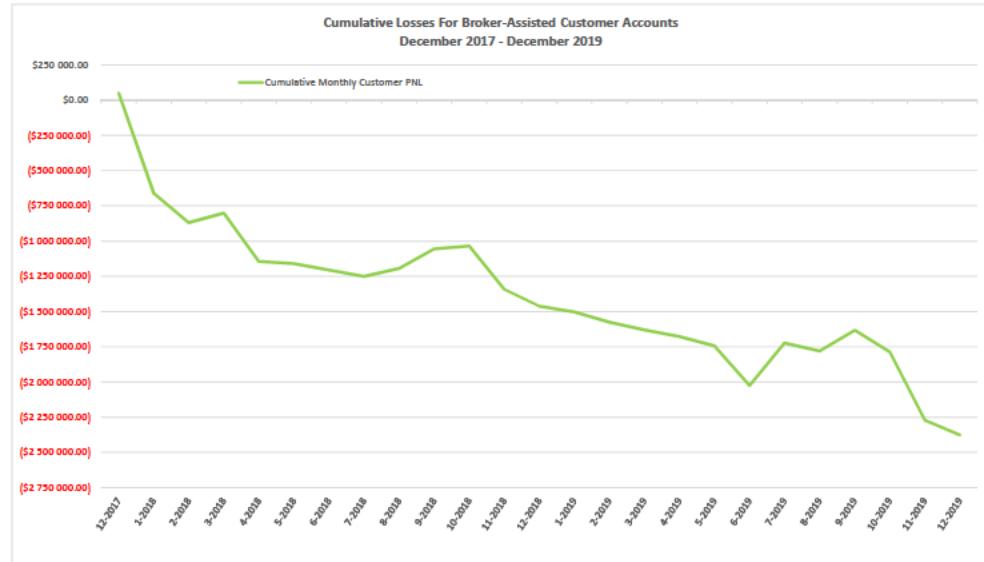
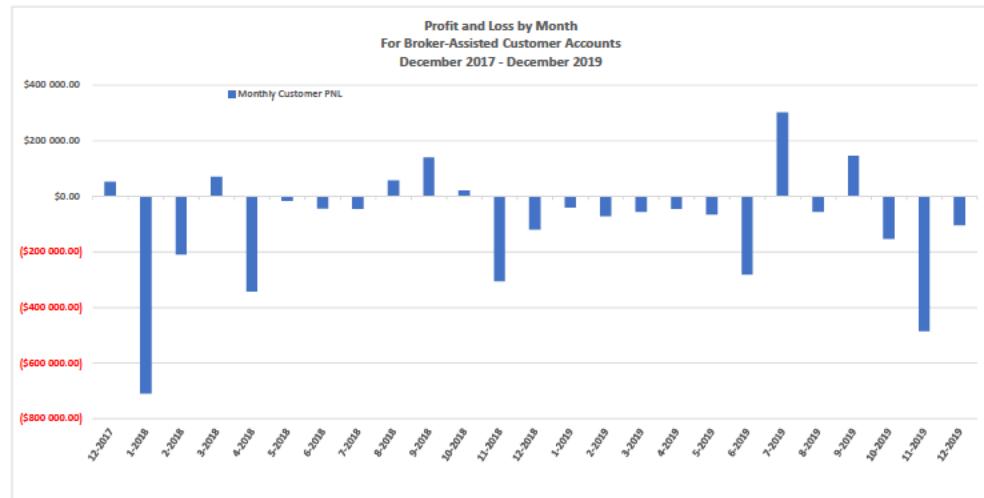
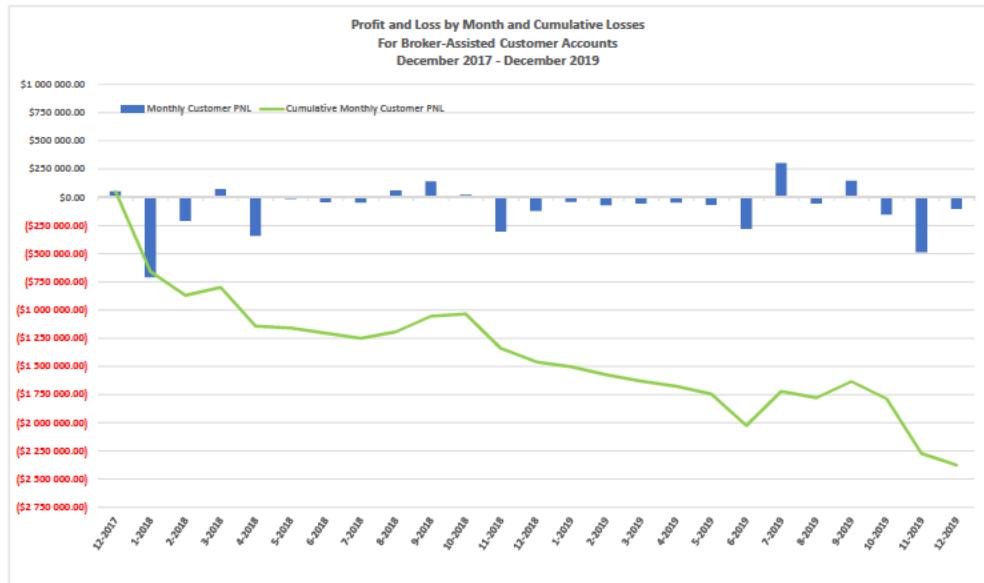
Ex. B

Client	AcctName
3602	Robert Wershay
3618	Valas Trading Co
3621	Simon Chew
3625	Patrick Meade
3628	Kevin Gill
3638	Patsy Luke
3640	William Kessler
3641	Adekunle Ogunbadejo
3642	Brian Ritter
3645	Scott H. Williams
3648	Charles L Horn
3650	David A Kocyba
3652	Edward John & Sally Ann Zandee
3654	Shu Lin
3656	Mill Trust Co Fbo Wilkinson
3657	Fred R Totzek
3658	Howard W Brynes
3659	David J Matulka
3661	John & Rhonda Boulette
3664	Donald Q Tran
3665	Martin & Claudio Behr
3667	Phoenix Flight Holdings Ltd
3673	David Cleary
3675	Amira Damouni
3676	Arif Basrai
3677	Seeds Of Nature Llc
3678	Curtis Partnership
3679	Mack Oil Company Inc
3683	Kingdom Trust Fbo Melville
3687	Thomas D Jackson
3693	Tareq Shehadeh Fayeq Alansari
3707	Janine J Cline
3737	Robert C. Warmington Rev.
3877	Mazen Alkouatli
3955	David Schaadtler
3956	Robert Mcrae
3963	Curt Rakestraw
3970	Noah Halfacre
3646	Daniel Raymond Smith
3756	Robert and Barbara Diyorio

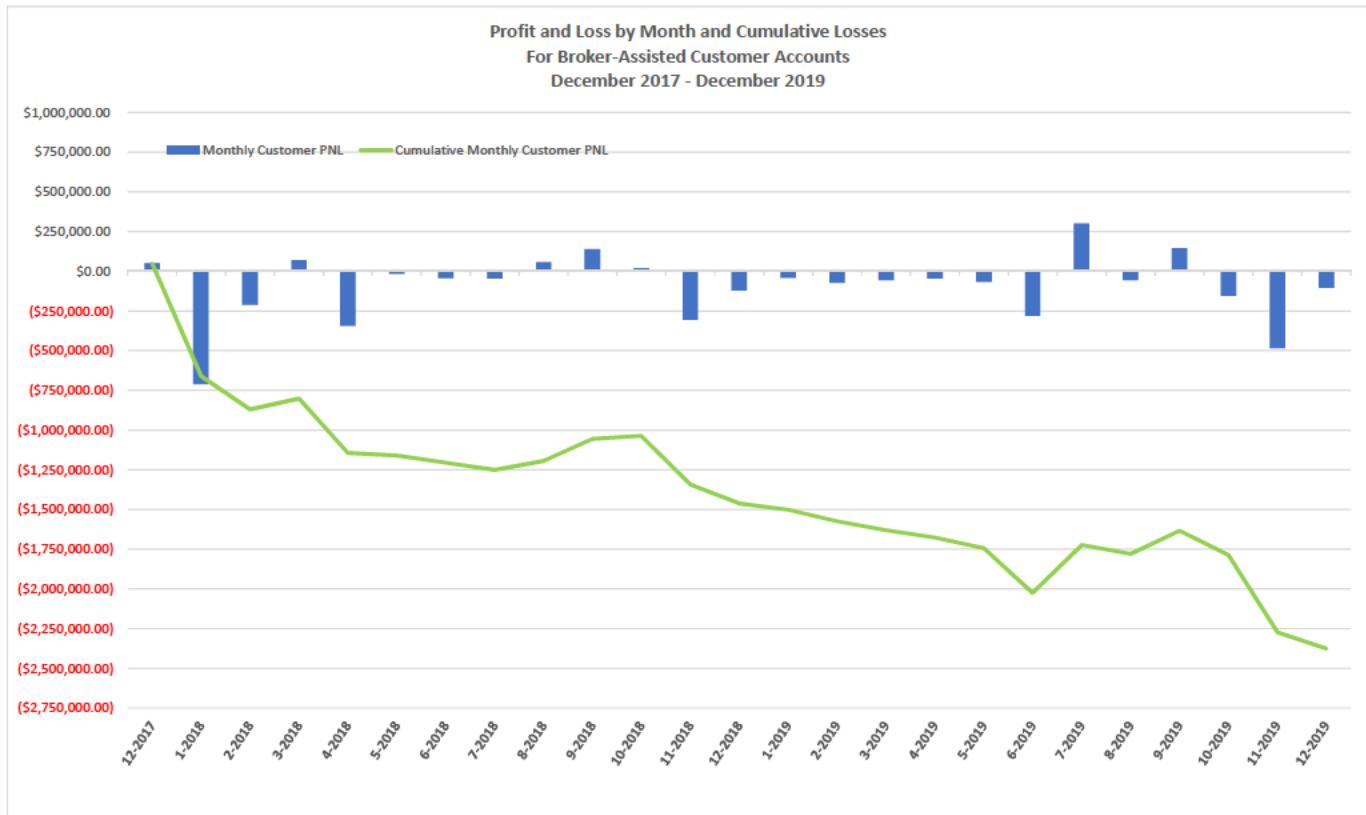
CFTC EXHIBIT

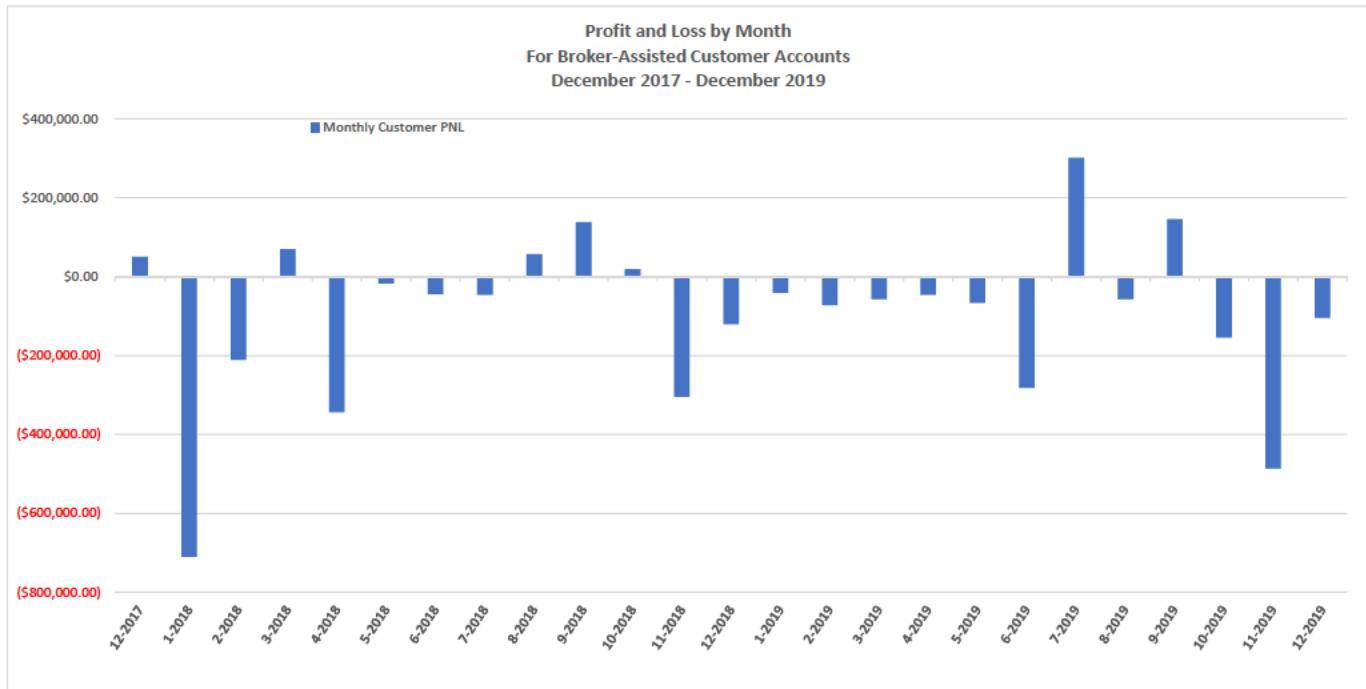
Ex. C

Month End	Monthly Customer PNL	Cumulative Monthly Customer PNL
12-2017	\$50,662.79	\$50,662.79
1-2018	(\$710,399.72)	(\$659,636.93)
2-2018	(\$210,665.91)	(\$870,302.84)
3-2018	\$69,714.07	(\$800,588.77)
4-2018	(\$343,316.49)	(\$1,143,905.26)
5-2018	(\$16,435.94)	(\$1,160,341.20)
6-2018	(\$44,398.68)	(\$1,204,739.88)
7-2018	(\$46,000.72)	(\$1,250,740.60)
8-2018	\$56,799.03	(\$1,193,941.57)
9-2018	\$138,352.79	(\$1,055,588.78)
10-2018	\$19,876.92	(\$1,035,711.86)
11-2018	(\$305,473.43)	(\$1,341,185.29)
12-2018	(\$119,988.99)	(\$1,461,174.28)
1-2019	(\$40,968.02)	(\$1,502,142.30)
2-2019	(\$72,530.78)	(\$1,574,673.08)
3-2019	(\$56,411.48)	(\$1,631,084.56)
4-2019	(\$45,604.46)	(\$1,676,689.02)
5-2019	(\$66,668.59)	(\$1,743,357.61)
6-2019	(\$281,247.92)	(\$2,024,605.53)
7-2019	\$301,638.99	(\$1,722,966.54)
8-2019	(\$56,352.49)	(\$1,779,319.03)
9-2019	\$146,099.22	(\$1,633,219.81)
10-2019	(\$153,558.29)	(\$1,786,778.10)
11-2019	(\$485,808.16)	(\$2,272,586.26)
12-2019	(\$104,151.67)	(\$2,376,737.93)



Month End	Monthly Customer PNL	Cumulative Monthly Customer PNL
12-2017	\$50,662.79	\$50,662.79
1-2018	(\$710,299.72)	(\$659,636.93)
2-2018	(\$210,665.91)	(\$870,302.84)
3-2018	\$69,714.07	(\$800,588.77)
4-2018	(\$343,316.49)	(\$1,143,905.26)
5-2018	(\$16,435.94)	(\$1,160,341.20)
6-2018	(\$44,398.68)	(\$1,204,739.88)
7-2018	(\$46,000.72)	(\$1,250,740.60)
8-2018	\$56,799.03	(\$1,193,941.57)
9-2018	\$138,352.79	(\$1,055,588.78)
10-2018	\$19,876.92	(\$1,035,711.86)
11-2018	(\$305,473.43)	(\$1,341,185.29)
12-2018	(\$119,988.99)	(\$1,461,174.28)
1-2019	(\$40,968.02)	(\$1,502,142.30)
2-2019	(\$72,530.78)	(\$1,574,673.08)
3-2019	(\$56,411.48)	(\$1,631,084.56)
4-2019	(\$45,604.46)	(\$1,676,689.02)
5-2019	(\$66,668.59)	(\$1,743,357.61)
6-2019	(\$281,247.92)	(\$2,024,605.53)
7-2019	\$301,638.99	(\$1,722,966.54)
8-2019	(\$56,352.49)	(\$1,779,319.03)
9-2019	\$146,099.22	(\$1,633,219.81)
10-2019	(\$153,558.29)	(\$1,786,778.10)
11-2019	(\$485,808.16)	(\$2,272,586.26)
12-2019	(\$104,151.67)	(\$2,376,737.93)





Ex. D

Payments Made to Long Leaf Trading Group Inc. by GAIN Capital Group LLC

Month	Year							
	2012	2013	2014	2015	2016	2017	2018	2019
Jan	\$ 133.00	\$ 2,986.00	\$ 32,184.00	\$ 81,612.00	\$ 113,617.00	\$ 79,951.00	\$ 76,029.00	
Feb	\$ 105.00	\$ 4,917.00	\$ 39,343.00	\$ 112,240.00	\$ 155,552.00	\$ 68,546.00	\$ 1,765.00	
March	\$ 91.00	\$ 4,636.00	\$ 106,100.00	\$ 93,748.00	\$ 163,237.00	\$ 59,261.00	\$ 1,317.00	
April	\$ 2,785.00	\$ 3,086.00	\$ 347,749.00	\$ 81,729.00	\$ 152,764.00	\$ 102,137.00	\$ 2,105.00	
May	\$ 3,328.00	\$ 4,595.00	\$ 40,768.00	\$ 86,654.00	\$ 152,618.00	\$ 98,776.00		
June	\$ 6,006.00	\$ 3,518.00	\$ 44,627.00	\$ 93,581.00	\$ 169,743.00	\$ 81,151.00		
July	\$ 3,144.00	\$ 4,600.00	\$ 36,988.00	\$ 86,171.00	\$ 141,754.00	\$ 71,318.00		
August	\$ 2,957.00	\$ 9,503.00	\$ 48,694.00	\$ 85,741.00	\$ 138,742.00	\$ 76,027.00		
September	\$ 3,167.00	\$ 22,627.00	\$ 54,540.00	\$ 108,896.00	\$ 118,048.00	\$ 37,000.00		
October	\$ 3,808.00	\$ 31,515.00	\$ 70,568.00	\$ 135,705.00	\$ 59,860.00	\$ -		
November	\$ 12,325.00	\$ 35,885.00	\$ 64,373.00	\$ 123,627.00	\$ 91,651.00	\$ 1,179.00		
December	\$ 49.00	\$ 6,108.00	\$ 37,432.00	\$ 53,744.00	\$ 163,154.00	\$ 84,474.00	\$ 11,453.00	

Payments Made to:

Beneficiary Long Leaf Trading Group, Inc.
 Account No. [REDACTED] 6339
 Bank JP Morgan Chase Bank, NA
 ABA 71000013

Ex. E

LONG LEAF TRADING

Sep-18

ACCT #	GROSS	TRADES	RATE	CUNN SHR	TRANS FEE	REBATE
LLT-010	1,180.00	56	0.75	-42.00		1,138.00
LLT-017	2,560.00	104	0.75	-78.00		2,482.00
LLT-028	36,070.00	1256	0.75	-942.00		35,128.00
LLT-029	9,640.00	356	0.75	-267.00		9,373.00
LLT-037	2,880.00	120	0.75	-90.00		2,790.00
						-814.00
						50,097.00
PROOF	52,330.00	1,892.00				
	-1,180.00	-56				
	-2,560.00	-104				
	-36,070.00	-1256				
	-9,640.00	-356				
	-2,880.00	-120				
	0.00	0.00				

Plus Trans fee

Add sept & OCT ON OCT PAYMENT

LONG LEAF TRADING

Oct-18

ACCT #	GROSS	TRADES	RATE	CUNN SHR	Sept		Oct	REBATE
					TRANS FEE	TRANS FEE		
LLT-010	1,180.00	56	0.75	-42.00	120.00		1,258.00	
LLT-017	2,560.00	104	0.75	-78.00	210.00		2,692.00	
LLT-028	36,070.00	1256	0.75	-942.00	2,436.00		37,564.00	
LLT-029	9,640.00	356	0.75	-267.00	729.00		10,102.00	
LLT-037	2,880.00	120	0.75	-90.00	228.00		3,018.00	
							-814.00	
							53,820.00	
PROOF	52,330.00	1,892						

-1,180.00	-56
-2,560.00	-104
-36,070.00	-1,256
-9,640.00	-356
-2,880.00	-120
0.00	0

Plus Trans fee

Add sept & OCT ON OCT PAYMENT

LONG LEAF TRADING

ACCT #	GROSS	TRADES	RATE	Sept		Oct	
				CUNN	SHR	TRANS FEE	TRANS FEE
LLT-002	1,440.00	48	0.75	-36.00	0.00	72.00	1,476.00
LLT-010			0.75	0.00	120.00		120.00
LLT-017	6,920.00	264	0.75	-198.00	210.00	549.00	7,481.00
LLT-028			0.75	0.00	2,436.00		2,436.00
LLT-029	85,105.00	3043	0.75	-2,282.25	729.00	6,591.00	90,142.75
LLT-037	3,580.00	157	0.75	-117.75	228.00	354.00	4,044.25
SEPT CTS FEE							-1,420.00
Comm ADJ							
LLT017							-940.00
LLT028							-14,170.00
LLT037							-580.00
FINAL REBATE							88,590.00
					3,723.00		

LONG LEAF TRADING						
Nov-18						
ACCT #	GROSS	TRADES	RATE	CUNN SHR	TRANS FEE	REBATE
LLT-001	1,300.00	60	0.75	-45.00	130.50	1,385.50
LLT-002	3,160.00	140	0.75	-105.00	358.50	3,413.50
LLT-010			0.75	0.00		0.00
LLT-017	5,760.00	209	0.75	-156.75	472.50	6,075.75
LLT-028	39,582.50	1479	0.75	-1,109.25	4,051.50	42,524.75
LLT-029			0.75	0.00		0.00
LLT-037			0.75	0.00		0.00
LLT-099	3.20	4	0.75	-3.00		0.20
NOV CTS FEE						-1,430.90
ICE FEE - OCT - NOV						-200.00
Comm ADJ	LLT-028					-4,400.00
	LLT-001					-120.00
	LLT-002					-260.00
	LLT-017					-400.00
	LLT-028					-3,740.00
LLT ERROR ACCOUNT HOLDBACK						-6,478.89
FINAL REBATE						36,369.91
						4,882.50

LONG LEAF TRADING						
12/31/18						
ACCT #	GROSS	TRADES	RATE	CUNN SHR	TRANS FEE	REBATE
LLT-001	945.00	39	0.75	-29.25	328.50	1,244.25
LLT-002	1,200.00	51	0.75	-38.25	318.00	1,479.75
LLT-003	780.00	30	0.75	-22.50	172.50	930.00
LLT-010			0.75	0.00		0.00
LLT-017	1,560.00	57	0.75	-42.75	373.50	1,890.75
LLT-028	70.50	42	0.75	-31.50	63.00	102.00
LLT-029			0.75	0.00		0.00

LLT-037	0.75	0.00	0.00
LLT-099	0.75	0.00	0.00
Comm ADJ			
DEC CTS FEES			-1,285.90
FINAL REBATE			4,360.85
		927.00	

LONG LEAF TRADING

Jan-19

ACCT #	GROSS	TRADES	RATE	JAN		REBATE
				CUNN	SHR	
LLT-001	5,530.00	234	0.75	-175.50	585.00	5,939.50
LLT-002	4,870.00	201	0.75	-150.75	517.50	5,236.75
LLT-003	4,760.00	181	0.75	-135.75	442.50	5,066.75
LLT-010			0.75	0.00		0.00
LLT-017	7,190.00	265	0.75	-198.75	669.00	7,660.25
LLT-028	0.00	0	0.75	0.00	0.00	0.00
LLT-029			0.75	0.00		0.00
LLT-037			0.75	0.00		0.00
LLT-099			0.75	0.00		0.00

Comm ADJ	LLT002	-80.00
	LLT003	-70.00
	LLT017	-80.00

JAN CTS FEES	0.00
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FINAL REBATE	23,673.25
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LONG LEAF TRADING

Feb-19

ACCT #	GROSS	TRADES	RATE	JAN		REBATE
				CUNN SHR	TRANS FEE	
LLT-001	5,360.00	268	0.75	-201.00	804.00	5,963.00
LLT-002	4,080.00	204	0.75	-153.00	600.00	4,527.00
LLT-003	4,200.00	210	0.75	-157.50	615.00	4,657.50
LLT-010			0.75	0.00		0.00
LLT-017	6,840.00	342	0.75	-256.50	1,003.50	7,587.00
LLT-028			0.75	0.00		0.00
LLT-029			0.75	0.00		0.00
LLT-037			0.75	0.00		0.00
LLT-099			0.75	0.00		0.00

Comm ADJ	ERROR ACCOUNT CREDIT ON 3/4/19	-4,490.00
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feb CTS FEES	-1,430.90
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w/trf fee - mar 2019	-30.00
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FINAL REBATE	16,783.60
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LONG LEAF TRADING

Mar-19

ACCT #	GROSS	TRADES	RATE	JAN		REBATE
				CUNN SHR	TRANS FEE	
LLT-001	8,060.00	403	0.75	-302.25	1,099.50	8,857.25
LLT-002	6,820.00	344	0.75	-258.00	886.50	7,448.50
LLT-003	6,460.00	323	0.75	-242.25	867.00	7,084.75
LLT-010			0.75	0.00		0.00
LLT-017	11,020.00	557	0.75	-417.75	1,419.00	12,021.25
LLT-028			0.75	0.00		0.00
LLT-029			0.75	0.00		0.00
LLT-037			0.75	0.00		0.00
LLT-099			0.75	0.00		0.00

Comm ADJ ERROR ACCOUNT CREDIT ON 3/4/19

LLT-001	-2,170.00
LLT-002	-40.00
LLT-003	-140.00
LLT-017	-840.00
CTS MONTHLY CHARGE	-1,430.90
w/trf fee - mar 2019	-30.00
FINAL REBATE	30,760.85

LONG LEAF TRADING

Apr-19

ACCT #	GROSS	TRADES	RATE	JAN		REBATE
				CUNN	SHR	
LLT-001	4,540.00	227	1.50	-340.50	640.50	4,840.00
LLT-002	3,780.00	189	1.50	-283.50	471.00	3,967.50
LLT-003	3,780.00	189	1.50	-283.50	475.50	3,972.00
LLT-010			1.50	0.00		0.00
LLT-017	8,450.00	430	1.50	-645.00	1,033.50	8,838.50
LLT-028			1.50	0.00		0.00
LLT-029			1.50	0.00		0.00
LLT-037			1.50	0.00		0.00
LLT-099			1.50	0.00		0.00

Comm ADJ

Legal Fee Payment	-520.00
Apr ICE Fee	-110.00
write off debit - f9999	-13,907.70
MAY 2019 ERROR ACCOUNT	-855.00

CTS MONTHLY CHARGE	-1,430.90
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w/trf fee - mar 2019	-30.00
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FINAL REBATE

4,764.40

LONG LEAF TRADING

June 2019

ACCT #	GROSS	TRADES	RATE	June 2019		REBATE
				CUNN	SHR	
LLT-001	7,000.00	350	1.50	-525.00	1,302.00	7,777.00
LLT-002	6,020.00	301	1.50	-451.50	1,136.00	6,704.50
LLT-003	16,415.00	907	1.50	-1,360.50	3,026.00	18,080.50
LLT-010			1.50	* 0.00		0.00
LLT-017	19,270.00	968	1.50	-1,452.00	3,041.50	20,859.50
LLT-028			1.50	0.00		0.00
LLT-029			1.50	0.00		0.00
LLT-037			1.50	0.00		0.00
LLT-099			1.50	0.00		0.00

Comm ADJ

ICE FEES	-110.00
write off June 2019 debit - f9999	-3,220.72

CTS MONTHLY CHARGE	-1,430.90
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w/trf fee - June 2019	-30.00
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FINAL REBATE	48,629.88
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LONG LEAF TRADING							
July 2019		July 2019					
ACCT #	GROSS	TRADES	RATE	CUNN	SHR	TRANS FEE	REBATE
LLT-001	2,600.00	130	1.50	-195.00	584.00		2,989.00
LLT-002	2,560.00	125	1.50	-187.50	558.00		2,930.50
LLT-003	10,195.00	594	1.50	-891.00	2,186.00		11,490.00
LLT-010			1.50	0.00			0.00
LLT-017	11,471.30	598	1.50	-897.00	2,280.00		12,854.30
LLT-028			1.50	0.00			0.00
LLT-029			1.50	0.00			0.00
LLT-037			1.50	0.00			0.00
LLT-099			1.50	0.00			0.00
Comm ADJ							
ICE FEES							-110.00
write off June 2019 debit - f9999							-4,302.96
CTS MONTHLY CHARGE							-1,430.90
w/trf fee - July 2019							-30.00
FINAL REBATE							24,389.94

LONG LEAF TRADING							
August 2019		use comm			August 2019		
ACCT #	GROSS	TRADES	RATE	CUNN	SHR	TRANS FEE	REBATE
LLT-001	4,140.00	207	1.50	-310.50	766.00		4,595.50
LLT-002	5,500.00	275	1.50	-412.50	964.00		6,051.50
LLT-003	22,840.00	1331	1.50	-1,996.50	4,970.00		25,813.50
LLT-010			1.50	0.00			0.00
LLT-017	23,270.00	1222	1.50	-1,833.00	4,498.00		25,935.00
LLT-028			1.50	0.00			0.00
LLT-029			1.50	0.00			0.00
LLT-037			1.50	0.00			0.00
LLT-099			1.50	0.00			0.00

Comm ADJ

ICE FEES	-110.00
write off June 2019 debit - f9999	-111.75
 CTS MONTHLY CHARGE	-1,430.90
w/trf fee - Aug 2019	-30.00
 FINAL REBATE	60,712.85

LONG LEAF TRADING

ACCT #	GROSS	September 2019			use comm		REBATE
		TRADES	RATE	CUNN SHR TRANS	Fee		
LLT-001	3,940.00	197	1.50	-295.50	742.00		4,386.50
LLT-002	5,160.00	258	1.50	-387.00	948.00		5,721.00
LLT-003	20,385.00	1223	1.50	-1,834.50	4,558.00		23,108.50
LLT-010			1.50	0.00			0.00
LLT-017	19,327.00	1031	1.50	-1,546.50	3,850.00		21,630.50
LLT-028			1.50	0.00			0.00
LLT-029			1.50	0.00			0.00
LLT-037			1.50	0.00			0.00
LLT-099			1.50	0.00			0.00

Comm ADJ

ICE FEES	-110.00
write off June 2019 debit - f9999	-1,194.88
Long Leaf RPM Review	-3,500.00
 CTS MONTHLY CHARGE	-1,430.90
w/trf fee - Aug 2019	-30.00
 FINAL REBATE	48,580.72

LONG LEAF TRADING						
October 2019		use comm		October 2019		
ACCT #	GROSS	TRADES	RATE	CUNN	SHR TRANS	REBATE
LLT-001	6,060.00	303	1.50	-454.50	1,032.00	6,637.50
LLT-002	8,100.00	405	1.50	-607.50	1,384.00	8,876.50
LLT-003	25,805.00	1522	1.50	-2,283.00	5,280.00	28,802.00
LLT-010			1.50	0.00		0.00
LLT-017	29,301.00	1533	1.50	-2,299.50	5,224.00	32,225.50
LLT-028			1.50	0.00		0.00
LLT-029			1.50	0.00		0.00
LLT-037			1.50	0.00		0.00
LLT-099			1.50	0.00		0.00
Comm ADJ						
ICE FEES						-110.00
write off June 2019 debit - f9999						-30.00
CTS MONTHLY CHARGE						-1,430.90
w/trf fee - Aug 2019						-30.00
FINAL REBATE						74,940.60

LONG LEAF TRADING						
November 2019		use comm		November 2019		
ACCT #	GROSS	TRADES	RATE	CUNN	SHR TRANS	REBATE
LLT-001	142.00	73	1.50	-109.50	454.00	486.50
LLT-002	3,780.00	189	1.50	-283.50	828.00	4,324.50
LLT-003	18,280.00	1130	1.50	-1,695.00	3,962.00	20,547.00
LLT-010			1.50	0.00		0.00
LLT-017	17,414.00	930	1.50	-1,395.00	3,512.00	19,531.00
LLT-028			1.50	0.00		0.00
LLT-029			1.50	0.00		0.00
LLT-037			1.50	0.00		0.00
LLT-099			1.50	0.00		0.00

Comm ADJ

ICE FEES	-110.00
write off Nov 2019 debit - f9999	-7,057.98

CTS MONTHLY CHARGE	-1,430.90
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w/trf fee	-30.00
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FINAL REBATE	36,260.12
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